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Clerk
St. Joseph County, Indiana

STATE OF INDIANA)	IN THE ST. JOSEPH SUP./CIR. COURT
) ss:	
COUNTY OF ST. JOSEPH)	SITTING AT SOUTH BEND, INDIANA
VERONICA ROGERS,)	
)	
Plaintiff,)	
)	CAUSE NO.: 71D05-2110-CT-000385
v.)	JURY DEMANDED
)	
PETSMART, LLC, and)	
CHRISTOPHER CLEVELAND,)	
a citizen of the State of Indiana,)	
)	
Defendants.)	

COMPLAINT

Comes now, Plaintiff, VERONICA ROGERS ("Veronica"), by counsel, MIDWEST INJURY LAWYERS, LLC, and for her Complaint against Defendants, PETSMART, INC. ("PetSmart") and CHRISTOPHER CLEVELAND ("Cleveland"), respectfully states as follows:

1. At all relevant times, PetSmart was and is the owner and/or occupier and operator of the store located at 4540 Grape Road, Mishawaka, St. Joseph County, IN 46545.
2. At all relevant times, Cleveland was the general manager of the store and a citizen of St. Joseph County, State of Indiana.
3. On December 26, 2020, Veronica was an invitee on the premises.
4. At all times relevant herein, Defendants owned, operated, controlled, and maintained the premises and supervised activities and employees on the premises.
5. On and before December 26, 2020, Defendants owed Veronica, as well as other similarly-situated individuals, a general duty to exercise reasonable care; to use reasonable care in the inspection, maintenance, and upkeep of the premises; to use reasonable care in supervising activities and employees on the premises; to use

reasonable care in training its employees to identify potential hazard and how to warn of, guard against, and/or remediate said hazards; to remove and/or repair hazardous conditions on the premises; to warn of hazards on the premises; to protect invitees from dangerous conditions on the premises and to make the premises reasonably safe.

6. On and/or before December 26, 2020, Defendants breached the foregoing duties and were negligent and/or reckless.

7. As a direct and proximate result of Defendants' negligence and/or recklessness, Veronica suffered a serious fall on the premises.

8. As a direct and proximate result of this incident, Veronica sustained permanent and severe personal injuries; incurred and will incur ambulance, hospital, diagnostic, surgical, therapeutic, pharmaceutical, and other medical expenses; suffered and will suffer physical pain, mental suffering, emotional distress, terror, fright, humiliation, disability, disfigurement, and loss of enjoyment of life, lost wages, loss of time, impairment of earnings capacity, and sustained other injuries and damages of a personal and pecuniary nature.

WHEREFORE, Plaintiff, VERONICA ROGERS, demands judgment in her favor and against Defendants, PETSMART, LLC and CHRISTOPHER CLEVELAND, for compensatory and punitive damages, for the costs of this action, for prejudgment interest and for any and all other relief that the Court may deem proper under the circumstances.

Respectfully submitted,

/s/Chester L. Cameron, Jr.
Attorney for Plaintiff

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JURY DEMAND

Plaintiff demands trial by jury on her Complaint.

Respectfully submitted,

/s/Chester L. Cameron, Jr.
Attorney for Plaintiff